

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

NASHVILLE DIVISION

FILED
U.S. DISTRICT COURT
MIDDLE DISTRICT OF TENN

AUG 29 2007

[Signature]
DEPUTY CLERK

UNITED STATES OF AMERICA

v.

NO. 3:07-00159

[1] JAMES C. MCWHORTER
a/k/a "CHRIS"
(Counts One and Two)

18 U.S.C. § 371
18 U.S.C. § 1028(a)(3)
18 U.S.C. § 1028(b)
18 U.S.C. § 2

[2] BEATRICE L. MCWHORTER
a/k/a "LYNN"
(Counts One and Two)

[3] ANTHONY W. KENNEDY
(Counts One and Two)

[4] CHAD E. VINCENT
(Count One)

[5] CHASTITY A. LEONARD
(Count One)

[6] RONNIE MACK HAMPTON
(Count One)

[7] ROGER T. RAPP
(Count One)

[8] DAVE MAYO, Jr.
(Count One)

[9] SHAWN L. SIMPSON
(Count One)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES:

1. From on or about March 1, 2006 through on or about November 8, 2006, in the Middle District of Tennessee and elsewhere, [1] **JAMES C. MCWHORTER** a/k/a "Chris", [2] **BEATRICE L. MCWHORTER** a/k/a "Lynn", [3] **ANTHONY W. KENNEDY**, [4] **CHAD E. VINCENT**, [5] **CHASTITY A. LEONARD**, [6] **RONNIE MACK HAMPTON**, [7] **ROGER T. RAPP**, [8] **DAVE MAYO, Jr.** and [9] **SHAWN L. SIMPSON** did willfully, knowingly and unlawfully combine, conspire, confederate, and agree with each other and with others to commit certain offenses against the United States, including the following:

(a) To knowingly and without lawful authority produce false identification documents, to wit, fraudulent driver's licenses, in violation of Title 18, United States Code, Section 1028(a)(1).

(b) To knowingly possess with the intent to use unlawfully and transfer unlawfully five or more false identification documents, in violation of Title 18, United States Code, Section 1028(a)(3) and 1028(b).

(c) To make, utter and possess, with the intent to deceive, counterfeited securities of a State and of various organizations, in violation of Title 18, United States Code, Section 513.

Manner and Means

2. It was a part of this conspiracy and the manner and means by which the conspiracy was sought to be accomplished by [1] **JAMES C. MCWHORTER** a/k/a "Chris" and his coconspirators:

(a) To obtain and use computer hardware and software to facilitate the manufacture of false identification documents such as driver's licenses from the states of Tennessee and Florida;

(b) To obtain and use computer printers specially equipped for the printing of identification documents such as driver's licenses and identification cards;

(c) To obtain and use materials required to manufacture false identification documents, such as blank plastic cards, heat seals and plastic cutters;

(d) To take the digital photographs of several individuals staged to appear as if the photos were official driver's license photographs, and to affix these photos to the fraudulent driver's licenses printed with false names and addresses;

(e) To obtain and use materials required to manufacture counterfeit payroll checks, such as computer software for check writing, blank check stock printing paper, and electronic logos and payroll check designs for various businesses, corporations and government entities;

(f) To produce counterfeit payroll checks fraudulently issued to false names matching the false names printed on the fraudulent driver's licenses; and

(g) To recruit numerous individuals to pass, utter and cash the counterfeit payroll checks at numerous businesses in the Middle District of Tennessee, using the fraudulent driver's licenses to enable the cashing of the counterfeit payroll checks.

Overt Acts

3. In furtherance of this conspiracy, and to effect the objects and purposes thereof, various overt acts were committed by [1] **JAMES C. MCWHORTER** a/k/a "Chris" and his coconspirators within the Middle District of Tennessee and elsewhere, including but not limited to the following:

(a) Between on or about March 1, 2006 and on or about November 8, 2006, [1] **JAMES C. MCWHORTER** and his coconspirators acquired materials necessary for the production of false identification documents, to include blank plastic identification cards, computer hardware, digital cameras, computer check-writing software, driver's license templates, plastic cutting devices, heat seals, blank check stock paper, printers and electronic versions of the commercial check logos for a variety of businesses.

(b) On or about July 16, 2006, [3] **ANTHONY KENNEDY** purchased an identification card printer on Ebay for \$1,100.

(c) Between on or about March 1, 2006 and on or about November 8, 2006, [1] **JAMES C. MCWHORTER** and his coconspirators produced hundreds of false identification documents, to wit, fraudulent driver's licenses from various states, to include Tennessee and Florida;

(d) Between on or about March 1, 2006 and on or about November 8, 2006, [1] **JAMES C. MCWHORTER** and his coconspirators produced hundreds of counterfeit payroll checks falsely purporting to be issued by numerous businesses, corporations, and government entities.

(e) Between on or about March 1, 2006 and on or about November 8, 2006, using counterfeit driver's licenses when proof of identification was required to cash fraudulent checks, [1] **JAMES C. MCWHORTER** and his coconspirators passed, uttered and cashed hundreds of counterfeit payroll checks worth over \$200,000.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

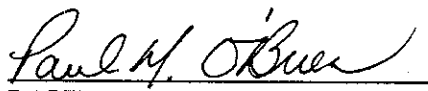
From on or about March 1, 2006 through on or about November 8, 2006, in the Middle District of Tennessee and elsewhere, [1] **JAMES C. MCWHORTER** a/k/a "Chris", [2] **BEATRICE L. MCWHORTER** a/k/a "Lynn", and [3] **ANTHONY W. KENNEDY** did knowingly possess with the intent to use unlawfully and to transfer unlawfully five or more false identification documents, to wit, fraudulent driver's licenses.

In violation of Title 18, United States Code, Sections 1028(a)(3), 1028(b)(1) and 2.

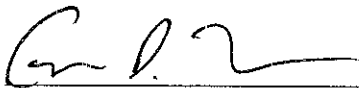
A TRUE BILL



FOREPERSON



PAUL M. O'BRIEN
UNITED STATES ATTORNEY



COURTNEY D. TROMBLY
ASSISTANT UNITED STATES ATTORNEY